

The current docket 02278 mentions that it is limited to outbound telemarketing. The Commission should explicitly state, if it has not already, that an outbound telemarketing call is one where the call originally was outbound, i.e. that it caused the recipient's phone to ring or otherwise indicate an incoming call, and that nothing, including any action a recipient shall take, including without limitation, pressing of any keys or speaking any responses will cause such calls to be reconsidered as other than outbound telemarketing calls.

Without this specific requirement, a telemarketer could argue that if a caller presses a key or performs some other action, they have voluntarily converted the call into an inbound or other type of call.